

FILED

MAR 02 2022

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHEFIU ANIMASHAUN HANSON,

Defendant.

INDICTMENT

3:22 CR 76
JUDGE ZOUHARY

CASE NO.

Title 18, United States Code,
Sections 1343, 1349, and 2

MAG JUDGE CLAY

COUNT 1

(Conspiracy, 18 U.S.C. § 1349)

The Grand Jury charges:

1. From in or around January of 2020 to in or around February of 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SHEFIU ANIMASHAUN HANSON, together with others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other, to commit offenses under Title 18, United States Code, Chapter 63, to wit: knowingly devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud and attempting to do so, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, and pictures, in violation of Title 18, United States Code, Section 1343.

Objects of the Conspiracy

2. The objects of the conspiracy were to: (1) deceive victim businesses into believing email accounts controlled by members of the conspiracy were in fact email accounts belonging to legitimate business partners, (2) solicit money wire transfers from the victim

ORIGINAL

businesses under the fraudulent pretense that the victim business was transferring funds for legitimate business purposes, (3) withdraw and transfer those funds to members of the conspiracy before the banks were notified of the fraudulent wire transfers, and (4) enrich the members of the conspiracy.

Manner and Means

3. The manner and means by which the conspiracy was conducted included the following:
 - a. Members of the conspiracy sent emails appearing to belong to legitimate business partners to victim businesses – for example, by using an email address such as emailaddress@businesss.com with an extra “s” in the word “business” rather than the true email address of emailaddress@business.com.
 - b. Operating under the false pretense that the email address used by members of the conspiracy was in fact an email address belonging to a legitimate business partner, members of the conspiracy sent victim businesses invoices and other requests for payment. The invoices and requests directed the victim business to send payment to accounts controlled by members of the conspiracy by wire transfer.
 - c. Members of the conspiracy created aliases using false names, false and fraudulent passports, driver’s licenses, and utility and phone bills as proof of identity and residence, and used the aliases to create false businesses and bank accounts to conceal the scheme. False bank accounts were opened utilizing addresses in Florida, Illinois, Indiana, New York, Ohio, and Texas.

- d. After receiving a fraudulent wire transfer deposit from a victim business, members of the conspiracy would quickly withdraw funds from the destination bank account by withdrawing cash, transferring funds to other bank accounts, and drawing cashier's checks.

Acts in Furtherance

4. On or about April 23, 2021, HANSON created an email account in the alias name of Junior Jacobs with the email address juniorjacobs776@gmail.com.

5. On or about May 3, 2021, HANSON opened a JP Morgan Chase bank account number in the name of Junior Williams Jacobs ("Jacobs Bank Account") at a bank location on 95th Street in Chicago, Illinois. HANSON presented a fraudulent South African Passport as proof of identity to open the account, as well as the juniorjacobs776@gmail.com email address.

6. On or about August 2, 2021, members of the conspiracy sent an email directing Business A, a Seneca County, Ohio, business known to the Grand Jury, to send a wire transfer to the Jacobs Bank Account for funds owed to Business B, a Colorado business known to the Grand Jury.

7. On or about August 4, 2021, HANSON received an interstate wire transfer deposit of \$31,447.54 from Business A into the Jacobs Bank Account.

8. On or about August 5, 2021, HANSON made three separate cash withdrawals of \$3,000, \$1,000, and \$8,000 from the Jacobs Bank Account at JP Morgan Chase locations in Chicago.

9. On or about August 6, 2021, HANSON sent an interstate wire transfer of \$20,000 from the Jacobs Bank Account to a Bank of America account registered to another alias name in Indiana and controlled by HANSON.

10. On or about August 9, 2021, HANSON received a wire transfer deposit of \$12,407.40 from Business A into the Jacobs Bank Account following another fraudulent email solicitation.

11. On or about August 9, 2021, HANSON made four separate cash withdrawals of \$1,000, \$1,000, \$2,000, and \$7,000 from the Jacobs Bank Account at JP Morgan Chase locations in Chicago.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-3
(Wire Fraud, 18 U.S.C. § 1343 and 2)

The Grand Jury further charges:

12. Paragraphs 1 through 11 of this Indictment are re-alleged and incorporated by reference as if fully set forth herein.

13. On or about the dates listed in the following table, in the Northern District of Ohio, Western Division, and elsewhere, Defendant SHEFIU ANIMASHAUN HANSON knowingly devised and intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises, as described in the factual allegations of paragraphs 1 through 11 of this Indictment.

14. For the purpose of executing and attempting to execute the scheme and artifice, Defendant HANSON transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals, and pictures, as follows:

Count	Approx. Date	Description of Wire Communication
2	August 4, 2021	Wire transfer of \$31,447.54 from Business A in Seneca County, Ohio to the Jacobs Bank Account in Chicago, Illinois
3	August 9, 2021	Wire transfer of \$12,407.40 from Business A in Seneca County, Ohio to the Jacobs Bank Account in Chicago, Illinois

All in violation of Title 18, United States Code, Section 1343 and 2.

FORFEITURE

The Grand Jury further charges:

15. The allegations contained in Counts 1 through 3 of this Indictment are hereby re-alleged and incorporated by reference as if fully set forth herein for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. Sections 981(a)(1)(C); 28 U.S.C. § 2461(c); and 18 U.S.C. § 982(a)(2). As a result of these offenses, Defendant, SHEFIU ANIMASHAUN HANSON, shall forfeit to the United States all property, real and personal, which constitutes or is derived from proceeds traceable to the commission of the violation charged in Count 1; and all property constituting, or derived from proceeds obtained directly or indirectly as a result of the violations charged in Counts 2 and 3.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.